

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Razan Matti

Case: 2:21-mj-30176

Assigned To : Unassigned

Assign. Date : 4/14/2021

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 13, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 USC § 922(a)(6)

Offense Description

Making false statements during the purchase of a firearm

This criminal complaint is based on these facts:

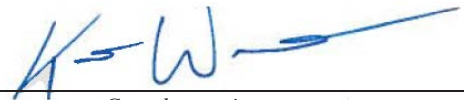
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 14, 2021

City and state: Detroit, Michigan



Complainant's signature

Kenton M. Weston, Special Agent (ATF)

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Kenton Weston, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since January 2018. I am currently assigned to the Detroit Field Division, Crime Gun Enforcement Team (CGET), where I am tasked with investigating violations of federal firearms laws. I have been involved in dozens of investigations involving violations of federal firearms laws, which have resulted in the seizure of hundreds of firearms. In addition, I have graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Razan MATTI** (W/F; DOB: XX/XX/2000) (hereinafter "MATTT") for violations of 18 U.S.C. § 922(a)(6) (making false statements during the purchase of a firearm).

3. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by

myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of the facts or details known to law enforcement related to this investigation.

PROBABLE CAUSE

4. In the summer and fall of 2020, ATF CGET Agents and I began investigating the alleged purchase of multiple firearms by Adult Victim 1 (AV-1) in August and September 2020 at multiple Federal Firearms License (FFL) locations in and around Detroit in the Eastern District of Michigan. Specifically, a review of the paperwork associated with these transactions revealed that AV-1 had allegedly purchased ten firearms from August 7, 2020 until September 7, 2020. Two of those firearms were later recovered by law enforcement at crime scenes in Detroit; those incidents had no apparent connection to AV-1. None of the firearms allegedly purchased by AV-1 had been registered with the State of Michigan.

5. On February 4, 2021, ATF Special Agent Kara Klupacs and I interviewed AV-1 concerning her alleged purchase of firearms. AV-1 denied purchasing any firearms and informed us that she had lost her Michigan driver's license in the summer of 2020 at a Red Roof Inn hotel in Southfield, Michigan. During the interview, AV-1 showed us her current Michigan driver's license, which showed an issue date of July 22, 2020. She further confirmed that her current and past phone numbers were not the phone number listed on any of the paperwork associated with the firearms purchased in August and September 2020.

6. I obtained and reviewed six of the ATF Form 4473s listing AV-1 as the purchaser. An ATF Form 4473 is required to be completed by a purchaser when purchasing a firearm from a FFL. On five of the six forms, the purchaser had listed his/her phone number as xxx-xxx-8038 with an area code from Los Angeles, California. On the remaining ATF Form 4473, the purchaser listed his/her phone number as xxx-xxx-4856.

7. I searched the Courts and Law Enforcement Management Information System (CLEMIS) for the 8038 number with the Los Angeles area code. This phone number was listed as Razan MATTI's

contact number fourteen times with ten law enforcement agencies over a nine-month period from October 7, 2019 to July 9, 2020. In addition, from my investigation in this case, I am aware that MATTI moved to Detroit from Los Angeles, California approximately seven years ago. I also conducted a search in a law enforcement databases for the 4856 phone number. The search revealed that the 4856 phone number was associated with MATTI's sister.

8. In February 2021, I conducted a search of LEIN for MATTI's criminal history and any open warrants. MATTI had been arrested twice and had six open warrants. MATTI did not have any registered firearms. Due to her age, MATTI is prohibited from purchasing pistols with her own identification from FFLs.

9. During the course of my investigation, I interviewed MATTI and learned that MATTI worked at the Southfield, Michigan Red Roof Inn—the hotel where AV-1 lost her identification—between approximately March 1, 2020 through at least March 1, 2021.

10. On March 3, 2021, Detroit Police Department (DPD) officers arrested MATTI on an outstanding warrant. During the arrest, officers seized two cell phones from MATTI's person, including one device

ending in -9948 with a Los Angeles area code. MATTI stated that both phones belonged to her. In addition, a search of the law enforcement database TLO reveals that the -9948 number is registered to MATTI.

11. On March 8, 2021, I obtained a federal search warrant for MATTI's cellular devices. This warrant was reviewed and issued by United States Magistrate Judge David R. Grand. Law enforcement conducted a forensic extraction of the devices and I subsequently completed a partial review of the forensic data.

12. In the forensic extraction of MATTI's cellular device ending in -9948 with the Los Angeles area code, I observed a photograph dated August 13, 2020 of a pistol sales record ("PSR") listing AV-1 as the purchaser and displaying what appears to be an invoice for a Smith & Wesson SD9VE 9mm (serial # FBN0878) and Glock 17 Gen4 9mm (serial# BPKF188) from the FFL CC Coins.

13. That photograph of the completed PSR and invoice was sent via text message from MATTI's device to another individual with a Detroit area code call number on August 13, 2020. A search of the law enforcement database TLO revealed the phone number is associated with the sales representatives who completed the sale at the FFL CC

Coins. In the text exchange between MATTI and the sales representative, MATTI sends the photograph of the completed PSR and invoice, and the sales representative appears to acknowledge a mistake in the paperwork that he/she will correct.

14. From reviewing the ATF Form 4473 associated with this purchase, I determined that this purchase occurred on August 13, 2020, *i.e.*, the same date as the text exchange between MATTI and the sales representative regarding the PSR and invoice. Additionally, I observed that although “AV-1” is listed as the purchaser, the phone number provided for the purchaser is the -8038 phone number associated with MATTI.

15. In addition, the ATF Form 4473 contained the following warning to the buyer:

Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.

On the form, the purchaser stated that he/she was the “actual buyer” of the firearm by checking the box, “Yes,” to the above question.

Furthermore, the ATF Form 4473 contained the following statement:

I also understand that making any false oral or

written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law ...

Below that statement, the purchaser signed his/her name as AV-1. As an ATF Special Agent, I am aware that if the purchaser had answered either that he/she was not the “actual buyer” or had refused to state that his/her answers were true or correct, then the FFL could not have sold the firearms to the purchaser.

16. Furthermore, MATTI’s cellular device ending in -9948 also contained a text conversation dated January 19, 2021 between MATTI and an additional, unknown individual where MATTI states that she uses other people’s identifications to buy firearms from FFLs. Specifically, she offers to sell a “22” firearm and then explains how she has sold multiple “Glocks” and “dracos” in the past. During the course of their conversation, MATTI explains that she purchases the guns in stores: “I was [going into the store] and had two other ppl doing it[.] I gave em 100 for each strap they grabbed but different ids.” MATTI added, “I was literally the gun plug everywhere I went.” MATTI further

states that she needs additional people to go to stores for her “with the ids I provide.” When asked how she can “pull that off,” MATTI responds that she “need[s] ppl that look like the ids I got,” and that the she uses “legit” identifications—“Mfs jus lost they Id.” Finally, she explains that she currently has identification for “about 4 girls and guys.”

17. I know from my training and experience as an ATF Special Agent that “22,” “Glocks,” and “dracos” likely refer to particular models or calibers of firearms. I further know that the term “strap” is a slang term for a firearm, and that a “gun plug” is a slang term for a firearm trafficker. I am also aware that a purchaser cannot purchase a firearm from an FFL without an actual form of photo identification such as a state driver’s license.

CONCLUSION

18. Based on the above information, I have probable cause to believe that Razan MATTI, who is prohibited from purchasing a pistol from an FFL due to her age, used the identification of AV-1 to purchase a Smith & Wesson SD9VE 9mm bearing serial # FBN0878 and a Glock 17 Gen4 9mm bearing serial number BPKF188 from the FFL CC Coin

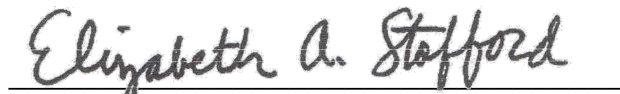
on August 13, 2020. In doing so, she made false statements during the purchase of a firearm, in violation of 18 U.S.C. § 922(a)(6). This violation occurred within the Eastern District of Michigan.

Respectfully submitted,



Kenton Weston, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: April 14, 2021